



**State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES**

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December 21, 2001

Mike Todd
Plant Manager
Prime Tanning Company, Inc.
216 Airport Road
P.O. Box 5050
Rochester, New Hampshire 03866

**LETTER OF COMPLIANCE
For
LETTER OF DEFICIENCY
No. ARD 2001-008**

Dear Mr. Todd

The New Hampshire Department of Environmental Services, Air Resources Division ("DES"), has reviewed the actions taken by Prime Tanning Company, Inc. ("Prime Tanning") in response to Letter of Deficiency No. ARD 2001-008 ("LOD"). DES has determined that the specific issues addressed in the LOD have been resolved in a manner consistent with the NH Admin. Rules Env-A 100-3600, NH Rules Governing the Control of Air Pollution. Based upon DES's determination that compliance with the LOD has been achieved, DES issues this Letter of Compliance.

Please be advised that this letter pertains only to compliance with the air pollution rules and statutes addressed in the LOD. It does not pertain to any outstanding compliance issues relative to water or waste rules or other statutes implemented by DES. This letter of compliance does not provide relief against any existing or future violations. DES will continue to monitor the compliance status of Prime Tanning.

DES understands that Prime Tanning is no longer operating its Rochester facility, but is maintaining the active status of its Title V permit TV-OP-012 ("the Permit"). The Permit requires Prime Tanning to submit periodic reports to DES. It is important that Prime Tanning be aware of, and maintains compliance with, all the requirements stipulated in the Permit even though the facility, or parts of the facility, are currently not operating.

The Permit requires Prime Tanning to submit annual reports of VOC and NOx emissions, fuel usage data, and process and throughput data for each coating operation. In addition, the Title V compliance certification must be submitted no later than April 15, 2002 for the period of calendar year 2001. The Permit also requires Prime Tanning to submit a semi-annual permit deviation and monitoring ("PD/M") report no later than January 31, 2002 for the period of July through December of 2001.

Prime Tanning can submit each of the above reports separately, on or prior to the date that each report is due. However, for reporting periods in which Prime Tanning has not operated, and therefore has minimal data to report, DES believes that Prime Tanning can meet all of the above reporting obligations by submitting the reports as outlined below.

One reporting package can be submitted on or before January 31 that contains the following information:

The semi-annual PD/M report for the reporting period of July through December of the preceding year. If there is no data to report, Prime Tanning may state that it has not operated during the period and, therefore, that no permit deviations occurred, and no monitoring was performed;

The annual compliance certification due on or prior to April 15. Prime Tanning must certify its compliance status with any requirement of the Permit still applicable during the preceding calendar year even while it was shutdown. Prime Tanning may state its compliance status as "Not Applicable" for those requirements that do not apply because the facility did not operate; and

The annual reporting of VOC and NOx emissions, fuel usage data, and process and throughput data for each coating operation, due on or prior to April 15. If Prime Tanning has not operated during the reporting period, these requirements can be addressed by stating that no processes were operated, no fuel was combusted and that no pollutants were emitted during the reporting period.

The semi-annual PD/M report for the reporting period of January through June must be submitted on or before the following July 31. If there is no data to report, Prime Tanning may state that it has not operated during the period and, therefore, that no permit deviations occurred and no monitoring was performed.

DES believes the above semi-annual submissions will meet all of the reporting obligations of the Permit. Prime Tanning must state on the cover page of each reporting package, the reporting requirements it is complying with in the semi-annual submissions. Please note that no reminder will be sent to Prime Tanning relative to the compliance deadlines for reporting. Failure to comply with the reporting requirements of the Permit may result in enforcement, including administrative fines.

If you have any questions regarding this Letter of Compliance or the reporting requirements contained in the Permit, please contact Raymond Walters, Compliance Bureau, Air Resources Division, at (603) 271-6288. Thank you for your cooperation.

Sincerely,



Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

K. Colburn, Director, DES/ARD
T. McCusker, EPA Region I
G. Rule, DES, O/C
E. Snyder, Prime Tanning, Environmental Supervisor
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Enforcement File